

Cascadia Advisory Services, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Cascadia Advisory Services, LLC. If you have any questions about the contents of this brochure, please contact us at (503) 620-5236 or by email at: info@cascadiawm.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Cascadia Advisory Services, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Cascadia Advisory Services, LLC's CRD number is: 290231.

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Registration does not imply a certain level of skill or training.

Version Date: 05/31/2018

Item 2: Material Changes

Cascadia Advisory Services, LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore there are no material changes to report.

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business.....	5
A. Description of the Advisory Firm.....	5
B. Types of Advisory Services.....	5
C. Client Tailored Services and Client Imposed Restrictions	6
D. Wrap Fee Programs	7
E. Assets Under Management	7
Item 5: Fees and Compensation	7
A. Fee Schedule	7
B. Payment of Fees.....	9
C. Client Responsibility For Third Party Fees	10
D. Prepayment of Fees.....	10
E. Outside Compensation For the Sale of Securities to Clients	10
Item 6: Performance-Based Fees and Side-By-Side Management	11
Item 7: Types of Clients	11
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss	11
A. Methods of Analysis and Investment Strategies	12
B. Material Risks Involved	12
C. Risks of Specific Securities Utilized.....	14
Item 9: Disciplinary Information	16
A. Criminal or Civil Actions	16
B. Administrative Proceedings.....	16
C. Self-regulatory Organization (SRO) Proceedings.....	16
Item 10: Other Financial Industry Activities and Affiliations	16
A. Registration as a Broker/Dealer or Broker/Dealer Representative	16
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.....	17
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests	17
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections	19
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	19
A. Code of Ethics.....	19
B. Recommendations Involving Material Financial Interests.....	19
C. Investing Personal Money in the Same Securities as Clients.....	19

D. Trading Securities At/Around the Same Time as Clients' Securities	20
Item 12: Brokerage Practices	20
A. Factors Used to Select Custodians and/or Broker/Dealers	20
1. Research and Other Soft-Dollar Benefits	20
2. Brokerage for Client Referrals	21
3. Clients Directing Which Broker/Dealer/Custodian to Use	21
B. Aggregating (Block) Trading for Multiple Client Accounts.....	21
Item 13: Review of Accounts	21
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews	21
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	21
C. Content and Frequency of Regular Reports Provided to Clients.....	22
Item 14: Client Referrals and Other Compensation	22
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)	22
B. Compensation to Non – Advisory Personnel for Client Referrals.....	23
Item 15: Custody.....	23
Item 16: Investment Discretion	23
Item 17: Voting Client Securities (Proxy Voting)	23
Item 18: Financial Information.....	23
A. Balance Sheet	24
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients.....	24
C. Bankruptcy Petitions in Previous Ten Years	24

Item 4: Advisory Business

A. Description of the Advisory Firm

Cascadia Advisory Services, LLC (hereinafter “CAS”) is a Limited Liability Company organized in the State of Oregon. The firm was formed in September 2017, and the principal owners are Greg Bowen, Douglas Perry and Robert Biancardi.

B. Types of Advisory Services

Portfolio Management Services

CAS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CAS creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- | | |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy |
| • Asset allocation | • Asset selection |
| • Risk tolerance | • Regular portfolio monitoring |

CAS evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. CAS will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

CAS seeks to provide investment decisions that are made in accordance with the fiduciary duties owed to its accounts and without consideration of CAS’s economic, investment or other financial interests. To meet its fiduciary obligations, CAS attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, CAS’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is CAS’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

CAS has discretion to choose third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, CAS will always ensure those other advisers are properly licensed or registered as an investment adviser. CAS conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings, and review of the third-party adviser's performance and investment strategy. When CAS allocates investments to a third-party, these investments may be allocated either through the third-party adviser's fund or through a separately managed account managed by such third-party adviser on behalf of CAS's client. CAS may also allocate among one or more private equity funds or

private equity fund advisers. CAS will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

Pension Consulting Services

CAS offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; retirement planning; legacy planning; life insurance; tax concerns; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

CAS generally limits its investment advice to stocks, mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, hedge funds, private equity funds, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities, venture capital funds and private placements. CAS may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

CAS will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by CAS on behalf of the client. CAS may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose reasonable restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CAS from properly servicing the client account, or if the restrictions would require CAS to deviate from its standard suite of services, CAS reserves the right to decline the investment relationship.

D. Wrap Fee Programs

CAS participates in wrap fee programs, which are investment programs where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. CAS manages the investments in the wrap fee program. Fees paid under the wrap fee program will be given to CAS as a management fee.

E. Assets Under Management

CAS has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$121,216,772.00	\$0	May 2018

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Maximum Annual Fees
\$0 - \$100,000	1.90%
\$100,001 - \$250,000	1.80%
\$250,001 - \$500,000	1.70%
\$500,001 - \$1,000,000	1.60%
\$1,000,001 - \$2,000,000	1.50%
\$2,000,001 - And Up	1.40%

CAS may bill in advance or in arrears. For accounts billed in advance, CAS uses the account balance on the last business day of the month prior to billing for the market value of the assets upon which the advisory fee is based. If the account is closed prior to the end of the period for which it has been billed, the client will receive a pro-rata refund for the amount.

For accounts billed in arrears, CAS uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full

refund of CAS's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 5 days' written notice.

Advisory fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced to the client and paid by check or credit card. Clients may select the method by which they are billed.

Platform Fee

To cover the cost of compliance oversight of new account documentation, investment due diligence, and trade review, among other costs, CAS charges clients a 0.06% annual platform fee. This fee is deducted either monthly or quarterly depending upon the frequency of billing and other charges to the account. Please see Exhibit II of the Investment Advisory Contract for the final fee schedule.

Selection of Other Advisers Fees

CAS will receive its standard fee on top of the fee paid to the third-party adviser. This relationship will be memorialized in each contract between CAS and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency.

CAS may engage in the selection of third-party money managers, but does not have any such arrangements in place at this time. This service may be canceled with 30 days' notice.

Pension Consulting Services Fees

Asset-Based Fees for Pension Consulting

Total Assets Under Management	Maximum Annual Fee
All Assets	1.00%

CAS uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Pension Consulting Agreement.

Clients may terminate the agreement without penalty for a full refund of CAS's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement generally with 30 days' written notice.

Fixed Fees

The rate for creating client pension consulting plans is up to \$50,000. The final fee schedule will be attached as Exhibit II of the Pension Consulting Agreement. This service may be canceled with 30 days' notice.

Hourly Fees

The hourly fee for these services is up to \$500. The final fee schedule will be attached as Exhibit II of the Pension Consulting Agreement.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is up to \$20,000.

Hourly Fees

The negotiated hourly fee for these services is up to \$500.

Clients may terminate the agreement without penalty, for full refund of CAS's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly or quarterly basis, or may be invoiced and billed directly to the client. Fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced to the client and paid by check or credit card. Clients may select the method by which they are billed. Fees are paid in arrears or in advance.

Payment of Pension Consulting Fees

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a monthly basis. Fees will be invoiced to the client and paid by check or credit card. Clients may select the method in which they are billed. Fees are paid in arrears or in advance.

Fixed pension consulting fees are paid via check. These fees are paid 100% in advance, but never more than six months in advance.

Hourly pension consulting fees are paid in arrears upon completion.

Payment of Selection of Other Advisers Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected.

Payment of Financial Planning Fees

Financial planning fees are paid via check.

Fixed financial planning fees are paid 100% in advance, but never more than six months in advance.

Hourly financial planning fees are paid in advance or in arrears upon completion.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (*i.e.*, custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CAS. Please see Item 12 of this brochure regarding broker-dealer/custodian.

For clients who participate in the wrap fee program, CAS will wrap third party fees (*i.e.* custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). CAS will charge clients one fee, and pay all transaction fees using the fee collected from the client.

D. Prepayment of Fees

CAS collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

E. Outside Compensation For the Sale of Securities to Clients

Greg Scott Bowen, Douglas Kay Perry, Robert Patrick Biancardi and Michael Paul Jeanfreau are registered representatives of a broker-dealer. Greg Scott Bowen, Douglas Kay Perry, Robert Patrick Biancardi and Michael Paul Jeanfreau are also insurance agents. In these roles, they accept compensation for the sale of investment products to CAS clients.

1. This is a Conflict of Interest

Supervised persons may accept compensation for the sale of investment products, including asset based sales charges or service fees from the sale of mutual funds to CAS's clients. This presents a conflict of interest and gives the supervised person an incentive to recommend

products based on the compensation received rather than on the client's needs. When recommending the sale of investment products for which the supervised persons receives compensation, CAS will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients always have the option to purchase CAS recommended products through other brokers or agents that are not affiliated with CAS.

3. Commissions are not CAS's primary source of compensation for advisory services

Commissions are not CAS's primary source of compensation for advisory services.

4. Advisory Fees in Addition to Commissions or Markups

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

Item 6: Performance-Based Fees and Side-By-Side Management

CAS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

CAS generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Charitable Organizations
- ❖ Corporations or Business Entities

There is no account minimum for any of CAS's services.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

CAS's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Charting analysis involves the use of patterns in performance charts. CAS uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale. Some factors that may be considered are the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

CAS uses long term trading, short term trading and options trading (including covered options, uncovered options, or spreading strategies).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not

always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns. One risk of this strategy is that it uses expected measures of risk and return, but the actual results may vary significantly from the expectations.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

CAS's use of options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Selection of Other Advisers: Although CAS will seek to select only money managers who will invest clients' assets with the highest level of integrity, CAS's selection process cannot ensure that money managers will perform as desired and CAS will have no control over the day-to-day operations of

any of its selected money managers. CAS would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Short-term trading risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities are exposed to interest rate risk. As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities. Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment in the future. Annuities are contracts issued by a life insurance company and are designed to meet future income requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Hedge funds often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or

uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

As a registered representative of Cetera Advisors LLC, Greg Scott Bowen accepts compensation for the sale of securities.

As a registered representative of Cetera Advisors LLC, Douglas Kay Perry accepts compensation for the sale of securities.

As a registered representative of Cetera Advisors LLC, Robert Patrick Biancardi accepts compensation for the sale of securities.

As a registered representative of Cetera Advisors LLC, Michael Paul Jeanfreau accepts compensation for the sale of securities.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither CAS nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Greg Scott Bowen is a registered representative of Cetera Advisors LLC and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CAS always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CAS in such individual's capacity as a registered representative.

Greg Scott Bowen is an investment adviser representative with another investment advisory firm, Cetera Advisors LLC, and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. CAS always acts in the best interest of the client and clients are in no way required to use the services of any representative of CAS in connection with such individual's activities outside of CAS.

Greg Scott Bowen is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CAS always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CAS in connection with such individual's activities outside of CAS.

Douglas Kay Perry is a registered representative of Cetera Advisors LLC and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CAS always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CAS in such individual's capacity as a registered representative.

Douglas Kay Perry is an investment adviser representative with another investment advisory firm, Cetera Advisors LLC, and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. CAS always acts in the best interest of the client and clients are in no way required to use the services of any representative of CAS in connection with such individual's activities outside of CAS.

Douglas Kay Perry is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CAS always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CAS in connection with such individual's activities outside of CAS.

Robert Patrick Biancardi is a registered representative of Cetera Advisors LLC and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CAS always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CAS in such individual's capacity as a registered representative.

Robert Patrick Biancardi is an investment adviser representative with another investment advisory firm, Cetera Advisors LLC, and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. CAS always acts in the best interest of the client and clients are in no way required to use the services of any representative of CAS in connection with such individual's activities outside of CAS.

Robert Patrick Biancardi is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CAS always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CAS in connection with such individual's activities outside of CAS.

Michael Paul Jeanfreau is a registered representative of Cetera Advisors LLC and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CAS always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CAS in such individual's capacity as a registered representative.

Michael Paul Jeanfreau is an investment adviser representative with another investment advisory firm, Cetera Advisors LLC, and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. CAS always acts in the best interest of the client and clients are in no way required to use the services of any representative of CAS in connection with such individual's activities outside of CAS.

Michael Paul Jeanfreau is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable

products conflict with the fiduciary duties of a registered investment adviser. CAS always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CAS in connection with such individual's activities outside of CAS.

Steven Raymond Dutton is an Adjunct Professor at Tillamook Bay Community College. He doesn't receive commission.

Jeremiah Beam is the Sole Proprietor of Beam 5 Creative Studio, a creative enterprise for the production and sale of creative goods and services.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

CAS has discretion to choose third-party investment advisers to manage all or a portion of the client's assets. Clients will pay CAS its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between CAS and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. CAS will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. CAS will ensure that all recommended advisers are licensed or notice filed in the states in which CAS is recommending them to clients.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

CAS has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. CAS's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

CAS does not recommend that clients buy or sell any security in which a related person to CAS or CAS has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of CAS may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of CAS to buy or sell

the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. CAS will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of CAS may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of CAS to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, CAS will never engage in trading that operates to the client's disadvantage if representatives of CAS buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on CAS's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and CAS may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in CAS's research efforts. CAS will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

CAS will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

1. *Research and Other Soft-Dollar Benefits*

While CAS has no formal soft dollars program in which soft dollars are used to pay for third party services, CAS may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). CAS may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and CAS does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. CAS benefits by not having to produce or pay for the research, products or services, and CAS will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware

that CAS's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

CAS receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. *Clients Directing Which Broker/Dealer/Custodian to Use*

CAS will require clients to use a specific broker-dealer (TD Ameritrade) to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If CAS buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, CAS would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. CAS would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for CAS's advisory services provided on an ongoing basis are reviewed at least Quarterly by Michael Jeanfreau, Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at CAS are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Michael Jeanfreau, Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, CAS's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of CAS's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and fees charged. This written report will come from the custodian. CAS will also provide at least quarterly a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CAS may accept compensation for client referrals, but does not have any such arrangements in place at this time. CAS will fully disclose to clients the details of any referral relationships.

CAS participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. CAS receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, CAS participates in TD Ameritrade's institutional advisor program and CAS may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between CAS's participation in the Program and the investment advice it gives to its clients, although CAS receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving CAS participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have CAS's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to CAS by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by CAS's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit CAS but may not benefit its client accounts. These products or services may assist CAS in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help CAS manage and further develop its business enterprise. The benefits received by CAS or its personnel through participation in the Program do not depend on the amount of

brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, CAS endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by CAS or its related persons in and of itself creates a conflict of interest and may indirectly influence the CAS's choice of TD Ameritrade for custody and brokerage services.

B. Compensation to Non – Advisory Personnel for Client Referrals

CAS may enter into written arrangements with third parties to act as solicitors for CAS's investment management services. Solicitor relationships will be fully disclosed to each Client to the extent required by applicable law. CAS will ensure each solicitor is exempt, notice filed, or properly registered in all appropriate jurisdictions. All such referral activities will be conducted in accordance with Rule 206(4)-3 under the Advisers Act, where applicable.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, CAS will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

CAS provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, CAS generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, CAS's discretionary authority in making these determinations may be limited by conditions imposed by a client if deemed reasonable by CAS (in investment guidelines or objectives, or client instructions otherwise provided to CAS).

Item 17: Voting Client Securities (Proxy Voting)

CAS will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

CAS neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither CAS nor its management has any financial condition that is likely to reasonably impair CAS's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

CAS has not been the subject of a bankruptcy petition in the last ten years.